

## CIVIL COVER SHEET

19 CV 129

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

DEVON WILLIAMS

(b) County of Residence of First Listed Plaintiff QUEENS  
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)  
LAW OFFICE OF ANDREW C. LAUFER, PLLC  
255 West 36th Street, Suite 1104, New York, NY 10018  
(212) 422-1020

## DEFENDANTS

THE VILLAGE OF FREEPORT, THE VILLAGE OF FREEPORT POLICE DEPARTMENT, POLICE OFFICER RONALD F. CURABA, SERGEANT MICHAEL J. DOLAN AND JOHN AND JANE DOE, et al

County of Residence of First Listed Defendant \_\_\_\_\_

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) \_\_\_\_\_

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	PTF	DEF	Citizen of Another State	PTF	DEF
<input checked="" type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/> 1	<input type="checkbox"/>	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4
			<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/> 5	<input type="checkbox"/> 5

Citizen or Subject of a Foreign Country  3  3 Foreign Nation  6  6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<b>LABOR</b>	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 368 Property Damage	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 385 Property Damage	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 386 Personal Injury - Medical Malpractice	<input type="checkbox"/> 390 Other Personal Injury	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<b>PRISONER PETITIONS</b>	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input checked="" type="checkbox"/> 440 Other Civil Rights	<b>Habeas Corpus:</b>	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty Other:	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 540 Mandamus & Other	<b>FEDERAL TAX SUITS</b>	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
		<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		
			<b>IMMIGRATION</b>	
			<input type="checkbox"/> 462 Naturalization Application	
			<input type="checkbox"/> 465 Other Immigration Actions	

## V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify) _____	<input type="checkbox"/> 6 Multidistrict Litigation
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Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**Assault & Battery and Excessive Force**

## VI. CAUSE OF ACTION

Brief description of cause:  
**Tased in left eye, causing permanent blindness.**

## VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION  
UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:  
**JURY DEMAND:**  Yes  No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER \_\_\_\_\_

DATE

01/08/2019

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**CERTIFICATION OF ARBITRATION ELIGIBILITY**

Local Arbitration Rule 83.10 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration 

I, ANDREW C. LAUFER, counsel for PLAINTIFF, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):


monetary damages sought are in excess of \$150,000, exclusive of interest and costs,  
 the complaint seeks injunctive relief,  
 the matter is otherwise ineligible for the following reason

**DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1**

Identify any parent corporation and any publicly held corporation that owns 10% or more or its stocks:

**RELATED CASE STATEMENT (Section VIII on the Front of this Form)**

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that "A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

**NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)**

1.) Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County?  Yes  No

2.) If you answered "no" above:

a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County?  Yes  No

b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District?  Yes  No

c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received:

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County?  Yes  No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

**BAR ADMISSION**

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

Yes

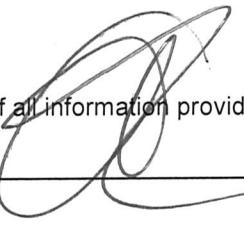
No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

Yes (If yes, please explain)

No

I certify the accuracy of all information provided above.

Signature: 

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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DEVON WILLIAMS,

Plaintiff,

-against-

THE VILLAGE OF FREEPORT, THE VILLAGE  
OF FREEPORT POLICE DEPARTMENT, POLICE  
OFFICER RONALD F. CURABA, SERGEANT  
MICHAEL J. DOLAN, AND JOHN AND JANE  
DOE OFFICERS OF THE VILLAGE OF FREEPORT  
POLICE DEPARTMENT,

Defendants,

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19cv129

VERIFIED COMPLAINT  
AND JURY TRIAL DEMAND

Plaintiff, by his attorney, ANDREW C. LAUFER., complaining of the  
Defendants herein, respectfully allege upon information and belief, as follows:

**JURISDICTION**

1. This is a civil action seeking compensatory damages, punitive damages, and attorney's fees.
2. This action is brought pursuant to the common law and statutory law of the State of New York and pursuant to 42 U.S.C §1983, § 1985(2)(3) and §1988 and the fourth, eighth, and fourteenth amendments to the Constitution of the United States.
3. Jurisdiction is founded upon 28 U.S.C. §1331, §1342 and §1367.
4. Plaintiff, invoking the pendent jurisdiction of this Court, also seeks monetary damages, as well as attorney's fees, for assault, battery, negligence, gross negligence, negligent screening, hiring, supervision, training, security, and retention of police officers.

5. The individual defendants are sued in their individual capacities as well as in their capacities as employees of defendants THE VILLAGE OF FREEPORT and THE VILLAGE OF FREEPORT POLICE DEPARTMENT.

**VENUE**

6. Venue is properly alleged in the Eastern District of New York in that the plaintiff resides within this district when not incarcerated.

**JURY TRIAL DEMAND**

7. Plaintiffs hereby demand a trial by jury of all issues in this action that are so triable.

**PARTIES**

8. At all times relevant hereto, plaintiff DEVON WILLIAMS was and is a natural person, and a resident of Inwood, New York.

9. At all times relevant hereto, defendants, POLICE OFFICER RONALD F. CURABA, SERGEANT MICHAEL J. DOLAN, AND JOHN AND JANE DOE OFFICERS OF THE VILLAGE OF FREEPORT POLICE DEPARTMENT were and are natural persons employed by the defendant THE VILLAGE OF FREEPORT as members of its Police Department.

10. At all times relevant hereto, defendant THE VILLAGE OF FREEPORT was and is a municipal corporation organized and existing pursuant to the laws of the State of New York.

11. At all times relevant hereto, defendant THE VILLAGE OF FREEPORT POLICE DEPARTMENT was and is a department of THE VILLAGE OF FREEPORT organized and existing pursuant to the laws of the State of New York.

12. On or about July 20, 2018, this date being within ninety (90) days after the claims herein accrued, plaintiff served upon the Village of Freeport and the Village of Freeport Police Department a verified written Notice of Claim setting forth the time, place, nature and manner in which said claims arose.

13. Thereafter, a General Municipal Law §50-h hearing of plaintiff Devon Williams, was conducted on November 14, 2018.

14. More than thirty (30) days have elapsed since the aforesaid verified Notice of Claim was served and the Village Attorney has neglected and refused to make payment on said claim.

15. This action is commenced within one year and 90 days from the date that the causes of action herein accrued.

#### **FACTS COMMON TO ALL CAUSES OF ACTION**

16. Plaintiff repeats, reiterates and realleges each and every allegation contained in paragraphs "1" through "15" hereinabove as if more fully set forth at length therein.

17. On or about May 16, 2018, at approximately 12:30 P.M., plaintiff Devon Williams was lawfully a passenger in a motor vehicle operated by his friend on or about the location known as 38 Terrace Avenue, Freeport, New York 11520.

18. At said time and place, the vehicle operated by his friend was pulled over by the defendants for an unknown reason.

19. The plaintiff, who was currently on probation, opened the vehicle's door and began running from the scene.

20. Defendants gave pursuit until such time as the plaintiff came upon another police car where he stopped and surrendered to the officers chasing him.

21. He was ordered to place his hands up and turn around since he was facing away from the pursuing officers.

22. As he slowly turned around in compliance with the pursuing defendants' orders, one of the defendants shot his Taser at Mr. Williams.

23. One of the Taser prongs entered Mr. William's left eye penetrating the orb.

24. The Taser then discharged its electricity into the eye and body of Mr. Williams who was not resisting and complying with the defendants' commands.

25. The electricity from the Taser discharge severely damaged Mr. Williams left eye and causing him to undergo multiple operative procedures.

26. The operative procedures were not successful in saving his left eye and its remnants were removed leaving him permanently blind in that eye.

27. Mr. Williams is currently being evaluated for another surgery to implant a prosthesis in the space where his left eye once occupied.

**AS AND FOR A FIRST CAUSE OF ACTION ON BEHALF OF PLAINTIFF  
AGAINST DEFENDANTS POLICE OFFICER RONALD F. CURABA,  
SERGEANT MICHAEL J. DOLAN, AND JOHN AND JANE DOE OFFICERS OF  
THE VILLAGE OF FREEPORT POLICE DEPARTMENT FOR EXCESSIVE  
FORCE**  
**(42. U.S.C. §1983 and §1985(2)(3)**

28. Plaintiff repeats, reiterates, and realleges each and every allegation contained in paragraphs "1" through "27" as if more fully set forth at length herein.

29. The individual defendants violated plaintiff DEVON WILLIAMS'S right to due process of law guaranteed to him by the fourth, eighth, and fourteenth amendments to the Constitution of the United States in that they, acting under color of state law, without either reasonable suspicion or probable cause to do so, improperly utilized and engaged in excessive force illegally and improperly assaulted, battered, and victimized him.

Defendants, with deliberate indifference, also failed to protect the health, safety, and welfare of the plaintiff. Further, defendants intentionally and with malice conspired to withhold information and refused to properly investigate this incident, and conspired to cover-up such unlawful activity as well as failed to intervene and prevent their co-defendants from violating the plaintiff's civil rights under color of state law.

30. Because the aforesaid acts committed by the individual defendants, Plaintiff DEVON WILLIAMS suffered a deprivation of the right to the due process of the law guaranteed to him by the fourth, eighth and fourteenth amendments to the Constitution of the United States and, as a result, was publicly humiliated, intimidated, terrorized, severely injured, and suffered severe mental anguish.

31. By reason of the aforesaid unconstitutional and illegal acts taken against them by the individual defendants, plaintiff has been damaged in the amount of Ten Million (\$10,000,000.00) Dollars.

**AS AND FOR A SECOND CAUSE OF ACTION ON BEHALF OF PLAINTIFF  
AGAINST THE VILLAGE OF FREEPORT, THE VILLAGE OF FREEPORT  
POLICE DEPARTMENT, POLICE OFFICER RONALD F. CURABA,  
SERGEANT MICHAEL J. DOLAN, AND JOHN AND JANE  
DOE OFFICERS OF THE VILLAGE OF FREEPORT  
POLICE DEPARTMENT (Assault and Battery)**

32. Plaintiffs repeat, reiterate and reallege each and every allegation contained in paragraphs "1" through "31" hereinabove as if more fully set forth at length here in.

33. On or about May 16, 2018, at approximately 12:30 P.M., plaintiff was lawfully a passenger in a motor vehicle operated by his friend on or about the location known as 38 Terrace Avenue, Freeport, New York 11520, without probable cause or provocation, was offensively touched, assaulted, battered and victimized when he was unlawfully tased by the individual defendant police officers.

34. The aforesaid force used by the individual defendants was not necessary or reasonable under the circumstances.

35. At the time, the individual defendants committed the aforementioned acts of assault and battery; they were acting within the scope of their employment by defendant THE VILLAGE OF FREEPORT AND THE VILALGE OF FREEPORT POLICE DEPARTMENT.

36. Further, the individual defendants failed to intervene in order to prevent co-defendants from violating the rights of the plaintiff.

37. By reason of the aforesaid act of assault and battery committed against him by the individual defendants, and the remaining individually named defendants' failing to aid the plaintiff and investigate his complaints while they were acting within the scope of their employment by defendant THE VILLAGE OF FREEPORT and THE VILLAGE OF FREEPORT POLICE DEPARTMENT, plaintiff DEVON WILLIAMS was publicly humiliated, intimidated, terrorized, severely injured, and suffered severe mental upset.

38. As a result of the aforesaid acts of battery, plaintiff DEVON WILLIAMS has been damaged in the amount of Ten Million (\$10,000,000.00) Dollars.

**AS AND FOR A THIRD CAUSE OF ACTION ON BEHALF OF PLAINTIFF  
DEVON WILLIAMS AGAINST DEFENDANTS THE VILLAGE OF FREEPORT,  
THE VILLAGE OF FREEPORT POLICE DEPARTMENT, POLICE  
OFFICER RONALD F. CURABA, SERGEANT MICHAEL J. DOLAN, AND  
JOHN AND JANE DOE OFFICERS OF THE VILLAGE OF FREEPORT  
POLICE DEPARTMENT  
(Negligence & Gross Negligence, )**

39. Plaintiff repeats, reiterates and realleges each and every allegation contained in paragraphs "1" through "38" hereinabove as if more fully set forth at length herein.

40. On or about May 16, 2018, at approximately 12:30 P.M., plaintiff was lawfully a passenger in a motor vehicle operated by his friend on or about the location known as 38 Terrace Avenue, Freeport, New York 11520, when without probable cause or provocation, was offensively touched, assaulted, battered and victimized when he was unlawfully and negligently tased by the individual defendant police officers.

41. At the time the individual defendants' committed the negligent acts in the following manner: in failing to adhere to the proper procedure and conduct when exercising force against the plaintiff; in negligently deploying force against the plaintiff which was excessive and not reasonable or necessary; in negligently deploying a Taser against the plaintiff when it wasn't reasonable or necessary to do so; in negligently aiming a Taser at the plaintiff causing him a severe physical injury; in negligently firing a Taser at the plaintiff causing him a severe physical injury; in negligently aiming and firing a taser at the plaintiff causing him a severe physical injury; in negligently supervising, overseeing, and training the individual defendants in the use of a Taser; in negligently failing to prevent plaintiff's injury; and in all ways being careless, reckless, negligent, and grossly negligent.

42. Further, the municipal defendants failed to discipline or properly discipline plaintiff's assailants.

43. The aforesaid wrongful acts committed by defendants were also a direct result of the negligence, recklessness and carelessness of the defendants THE VILLAGE OF FREEPORT and THE VILLAGE OF FREEPORT POLICE DEPARTMENT in screening, hiring, training, retaining, and supervising the individual defendants.

44. Solely as a result of the aforesaid negligence, recklessness and carelessness of defendants THE VILLAGE OF FREEPORT and THE VILLAGE OF FREEPORT POLICE DEPARTMENT, POLICE OFFICER RONALD F. CURABA, SERGEANT MICHAEL J. DOLAN, AND JOHN AND JANE DOE OFFICERS OF THE VILLAGE OF FREEPORT POLICE DEPARTMENT and through no culpable conduct on part of plaintiff DEVON WILLIAMS, plaintiff DEVON WILLIAMS suffered a deprivation of the right to the due process of the law guaranteed to him by the fourth, eighth and fourteenth amendments to the Constitution of the United States and, as a result, was deprived of his civil rights, liberty, suffered physical, mental and emotional injuries, injury to his reputation, humiliation and embarrassment.

45. By reason of the aforementioned negligence of defendants THE VILLAGE OF FREEPORT and THE VILLAGE OF FREEPORT POLICE DEPARTMENT, and through no culpable conduct on the part of plaintiff DEVON WILLIAMS, plaintiff DEVON WILLIAMS, has been damaged in the sum of Ten Million (\$10,000,000.00) Dollars.

WHEREFORE, Plaintiffs, DEVON WILLIAMS, demand judgment against defendants, THE VILLAGE OF FREEPORT and THE VILLAGE OF FREEPORT POLICE DEPARTMENT, POLICE OFFICER RONALD F. CURABA, SERGEANT MICHAEL J. DOLAN, AND JOHN AND JANE DOE OFFICERS OF THE VILLAGE OF FREEPORT POLICE DEPARTMENT as follows:

FIRST CAUSE OF ACTION: Ten Million (\$10,000,000.00) Dollars;

SECOND CAUSE OF ACTION: Ten Million (\$10,000,000.00) Dollars;

THIRD CAUSE OF ACTION: Ten Million (\$10,000,000.00) Dollars;

Plaintiff, in addition, demands the costs and disbursements of this action, punitive damages, and attorney's fees, pursuant to 42. U.S.C. §1988.

Dated: New York, New York  
January 7, 2019

LAW OFFICE OF  
ANDREW C. LAUFER, PLLC

By: Andrew C. Laufer  
Attorney for Plaintiff  
~~DEVON WILLIAMS~~  
255 West 36<sup>th</sup> Street, Suite 1104  
New York, New York 10018  
(212) 422-1020

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT COURT

## Index:

Year:

DEVON WILLIAMS,

Plaintiff,

-against-

THE VILLAGE OF FREEPORT, THE VILLAGE OF FREEPORT POLICE DEPARTMENT, POLICE OFFICER RONALD F. CURABA, SERGEANT MICHAEL J. DOLAN, AND JOHN AND JANE DOE OFFICERS OF THE VILLAGE OF FREEPORT POLICE DEPARTMENT.

Defendants,

## VERIFIED COMPLAINT AND JURY TRIAL DEMAND

LAW OFFICE OF ANDREW C. LAUFER

**Attorney(s) for Plaintiff**

Office and Post Office Address  
255 W. 36th Street, Suite 1104  
New York, NY 10018

Tel: (212) 422 1020  
Fax: (212) 422 1069

To:

Signature (Rule 130-1.1-a)

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Print name beneath

Service of a copy of the within is hereby admitted.

Dated:

Attorney(s) for:

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

duly entered in the office

and duly entered in the book of the Clerk of the County Court on

NOTICE OF SETTLEMENT

that an order of which the within is a true copy  
will be presented for settlement to the HON one of the judges of the  
within named Court at

Yours, etc.

## Law Office of Andrew C. Laufer